

**DYNAMIS LLP**

Jamie Hoxie Solano, Esq.  
NJ Bar No. 426422024  
(214) 454-8829  
11 Park Place  
New York, NY 10007

Michael B. Homer, Esq.  
(617) 693-9732  
Constantine Economides, Esq.  
(305) 985-2959  
Eric Rosen, Esq.  
(617) 802-9157  
225 Franklin Street, 26th Floor  
Boston, MA 02110

*Pro hac vice applications pending*

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**HAYDEN GATEWAY LLC and  
BLOC DISPENSARY LLC,**

**Plaintiffs,**

**v.**

**ADVANCED FLOWER  
CAPITAL INC. and AFC  
AGENT LLC,**

**Defendants.**

**CIVIL ACTION NO. 3:25-CV-02789-ZHQ-JBD**

**NOTICE OF EMERGENT APPLICATION BY  
PETITIONERS FOR AN ORDER TO SHOW  
CAUSE WITH TEMPORARY RESTRAINTS  
TO BE CONVERTED TO A PRELIMINARY  
INJUNCTION**

**Oral Argument Requested**

**Return Date: To Be Determined**

PLEASE TAKE NOTICE that at a date and time to be set by the Court, pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1, Plaintiffs Hayden Gateway LLC (“Hayden”) and Bloc Dispensary LLC (“Bloc”) (jointly, “Plaintiffs”), by and through counsel, DYNAMIS LLP,

will request that the Honorable Zahid N. Quraishi, United States District Judge for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, Courtroom 4W, enter an Order to Show Cause with Temporary Restraints, to be converted into a Preliminary Injunction, ordering Defendants Advanced Flower Capital Inc. and AFC Agent LLC (jointly, “Defendants”) to cease seizing any of Plaintiffs’ assets or cash (beyond the permitted scheduled cash sweeps), and to cease any other attempted remedy for any alleged default.

PLEASE TAKE FURTHER NOTICE that in support of its Application and the Order to Show Cause, Plaintiffs will rely on the Memorandum of Law submitted herewith, the Declarations of Michael Kanovitz, Joel Feldman, Vasillios Papatheofanis, Alexzandra Fields, William Murray III, and Gail Brashers-Krug, and the Exhibits thereto, all of which Plaintiffs will serve upon Defendants simultaneously with the filing of this Notice. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiffs respectfully request oral argument on this application and the Order to Show Cause.<sup>1</sup>

Dated: April 21, 2025

Respectfully submitted,

**DYNAMIS LLP**

By: /s/ Jamie Hoxie Solano  
 Jamie Hoxie Solano, Esq.  
 NJ Bar No. 426422024  
 (214) 454-8829  
 11 Park Place  
 New York, NY 10007  
 JSolano@dynamisllp.com

---

<sup>1</sup> The undersigned, Jamie Hoxie Solano, Esq., is currently in Portugal and is scheduled to fly back to the United States on Wednesday, April 23, 2025. In the event the Court wishes to set a hearing prior to Thursday, April 24, 2025, the undersigned respectfully requests that the Court permit the undersigned to appear telephonically and permit her partners (whose *pro hac vice* applications are currently pending) to appear in person to address the Court regarding this application. The undersigned notes further that she is scheduled to be on a flight (and thus not available) from approximately 6:30 a.m. through 3:30 p.m. Eastern Time on Wednesday, April 23, 2025, but her partners will remain available during that time.

Michael B. Homer, Esq.  
(617) 693-9732  
MHomer@dynamisllp.com  
Constantine Economides, Esq.  
(305) 985-2959  
CEconomides@dynamisllp.com  
Eric Rosen, Esq.  
(617) 802-9157  
ERosen@dynamisllp.com  
225 Franklin Street, 26th Floor  
Boston, MA 02110

*Pro Hac Vice Applications Pending*

*Attorneys for Plaintiffs*

### **CERTIFICATE OF SERVICE**

I, Jamie Hoxie Solano, hereby certify that on the date indicated below, I caused a true and correct copy of the foregoing document to be served via email on Abby F. Rudzin, counsel for the defendants, who has agreed to accept service on behalf of the defendants.

Dated: April 21, 2025

/s/ Jamie Hoxie Solano  
Jamie Hoxie Solano, Esq.